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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO APPLICATIONS FOR
INTERIM COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF ACUTAL AND NECESSARY EXPENSES INCURRED
BY APPLICANTS FROM AUGUST 1, 2019 THROUGH NOVEMBER 30, 2019**

Irving H. Picard, as trustee (the "Trustee") for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-*lll* and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On March 11, 2020, the Trustee filed the Applications for Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred by Applicants from August 1, 2019 through November 30, 2019 (the “Fee Applications”). These Fee Applications include the following:

- A. Thirty-Second Application of Trustee and Baker & Hostetler LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from August 1, 2019 through November 30, 2019 for Baker & Hostetler, L.L.P., Trustee's Attorney, period: 8/1/2019 to 11/30/2019, fee: \$30,026,127.96, expenses: \$316,885.66 filed by Baker & Hostetler, LLP (Filed: 3/11/2020) [ECF No. 19383]
- B. Thirty-First Application of Windels Marx Lane & Mittendorf, LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from August 1, 2019 through November 30, 2019 for Windels Marx Lane & Mittendorf, LLP, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$1,776,618.0, expenses: \$10,863.09 filed by Windels Marx Lane & Mittendorf, LLP (Filed: 3/11/2020) [ECF No. 19385]
- C. Application of Schiltz & Schiltz as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2019 through November 30, 2019 for Schiltz & Schiltz, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$108,636.57, expenses: \$7,061.38 filed by Schiltz & Schiltz (Filed: 3/11/2020) [ECF No. 19386]
- D. Application of Higgs & Johnson (Formerly Higgs Johnson Truman Bodden & Co.) as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2019 through November 30, 2019 for Higgs & Johnson (formerly Higgs Johnson Truman Bodden & Co.), Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$181.45, expenses: \$0.00 filed by Higgs & Johnson (formerly Higgs Johnson Truman Bodden & Co.) (Filed: 3/11/2020) [ECF No. 19387]
- E. Application of Soroker Agmon Nordman as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2019 through November 30, 2019 for Soroker Agmon Nordman, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$348,224.99, expenses: \$17,341.92 filed by Soroker Agmon Nordman (Filed: 3/11/2020) [ECF No. 19388]
- F. Application of Graf & Pitkowitz Rechtsanwalte GmbH as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2019 through November 30,

2019 for Graf & Pitkowitz Rechtsanwalte GmbH, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$39,471.26, expenses: \$2,305.53 filed by Graf & Pitkowitz Rechtsanwalte GmbH (Filed: 3/11/2020) [ECF No. 19389]

- G. Twenty-Seventh Application of Young Conaway Stargatt & Taylor, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from August 1, 2019 through November 30, 2019 for Young Conaway Stargatt & Taylor, LLP, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$18,871.20, expenses: \$308.10 filed by Young Conaway Stargatt & Taylor, LLP (Filed: 3/11/2020) [ECF No. 19390]
- H. Application of UGGC & Associes as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2019 through November 30, 2019 for UGGC & Associes, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$69,388.22, expenses: \$0.00 filed by UGGC & Associes (Filed: 3/11/2020) [ECF No. 19391]
- I. Application of Browne Jacobson, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from August 1, 2019 through November 30, 2019 for Browne Jacobson, LLP, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$327,311.18, expenses: \$489.56 filed by Browne Jacobson, LLP (Filed: 3/11/2020) [ECF No. 19392]
- J. Application of Eugene F. Collins as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2019 through November 30, 2019 for Eugene F. Collins, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$6,393.65, expenses: \$71.02 filed by Eugene F. Collins (Filed: 3/11/2020) [ECF No. 19393]
- K. Seventh Application of Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2019 through November 30, 2019 for Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$182,848.50, expenses: \$8,104.56 filed by Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP (Filed: 3/11/2020) [ECF No. 19394]
- L. Seventh Application of The Scaletta Law Firm, PLLC as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2019 through November 30, 2019 for The Scaletta Law Firm, PLLC, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$18,589.50, expenses: \$0.00 filed by The Scaletta Law Firm, PLLC (Filed: 3/11/2020) [ECF No. 19395]

M. Application of SCA Creque as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2019 through November 30, 2019 for SCA Creque, Special Counsel, period: 8/1/2019 to 11/30/2019, fee: \$10,185.17, expenses: \$0.00 filed by SCA Creque (Filed: 3/11/2020) [ECF No. 19396]

N. Application of Ritter Schierscher Rechtsanwalte as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from June 1, 2019 through November 30, 2019 for Ritter Schierscher Rechtsanwalte, Special Counsel, period: 6/1/2019 to 11/30/2019, fee: \$549.92, expenses: \$0.00 filed by Ritter Schierscher Rechtsanwalte (Filed: 3/11/2020) [ECF No. 19397]

2. The deadline for filing objections to the Fee Applications expired on April 22, 2020 at 4:00 p.m. A hearing on the Fee Applications has been scheduled for April 29, 2020 at 10:00 a.m.

3. Pursuant to the Order Establishing Notice Procedures (*Sec. Inv'r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-1789 (SMB), ECF No. 4560) (the “Notice Order”), notice of hearing on the Fee Applications was provided by U.S. Mail postage prepaid or email to: (i) all parties included in the Master Service List as defined in the Notice Order; (ii) all parties that filed a notice of appearance in this case; (iii) the SEC; (iv) the IRS; (v) the Acting United States Attorney for the Southern District of New York; and (vi) SIPC.

4. Counsel has reviewed the Court’s docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Fee Applications appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Fee Applications.

5. An electronic copy of the proposed order (the “Order”), that is substantially in the form of the proposed order that was annexed to the Fee Applications will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: April 27, 2020
New York, New York

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